

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

IN RE:

**ARCHIE VERNON VEALE  
SIERRA LEONNE VEALE  
Debtor(s)**

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Case No.: **17-10243-RAG**

Chapter 13

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**THE CHAPTER 13 TRUSTEE'S  
REQUESTS FOR ADMISSION OF FACT  
TO CLAIMANT, U.S. BANK TRUST, NA**

Nancy Spencer Grigsby, Chapter 13 Trustee, requests U.S. Bank Trust, NA, not later than thirty (30) days after service of this request, admit for the purpose of this action, the truth of the facts stated in section II below, pursuant to Rule 36 of the Federal Rules of Civil Procedure and Rule 7036 of the Federal Rules of Bankruptcy Procedure.

**I. Instructions and Definitions**

A. If, within thirty (30) days after service upon you, you do not answer or object to the specific facts stated in section II below, the matter is admitted as true for the purposes of this action. Fed. R. Civ. P. 36(a)(3); Fed. R. Bankr. P. 7036.

B. If you object to any request, the reason therefore shall be stated. You may not object solely on the ground that the request presents a genuine issue for trial. Fed. R. Civ. P. 36(a)(5); Fed. R. Bankr. P. 7036.

C. If the requested fact is not admitted, the answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter.

Fed. R. Civ. P. 36(a)(4); Fed. R. Bankr. P. 7036.

D. You may not give lack of information or knowledge as a reason for failure to admit or deny unless you state that you made reasonable inquiry and that the information known or easily obtainable by you is insufficient to admit or deny the requested fact. Fed. R. Civ. P. 36(a)(4); Fed. R. Bankr. P. 7036.

E. The terms “person” or “persons” includes natural persons, partnerships, corporations and other legal entities.

F. The terms “you” or “your” shall refer to Claimant, U.S. Bank Trust, NA c/o SN Servicing Corporation, as well as any of its officers, directors, agents, employees, representatives and/or attorneys.

G. The term “U.S. Bank Trust, NA c/o SN Servicing Corporation” shall refer to Claimant, U.S. Bank Trust, NA c/o SN Servicing Corporation, as well as any of its officers, directors, agents, employees, representatives and/or attorneys.

I. The term “Debtors” means Archie Vernon Veale and Sierra Leonne Veale, the debtors in this bankruptcy case.

## **II. Facts to be Admitted**

1. The address where notices to U.S. Bank Trust, NA c/o SN Servicing Corporation concerning this bankruptcy case should be sent is, 323 Fifth Street, Eureka, CA 95501.

2. D. Anthony Sottile signed the Transfer of claim filed by U.S. Bank Trust, NA c/o SN Servicing Corporation, which was filed on February 6, 2019.

3. The Corporation Trust, Incorporated is the Maryland Resident Agent for U.S. Bank

Trust, NA.

4. The Corporation Trust, Incorporated is located at 2405 York Rd, Suite 201, Lutherville Timonium, MD 21093.

5. Your proof of claim asserts that you had a secured claim for \$112,484.53. You assert that the amount necessary to cure any default as of the date of the petition was \$21,290.46.

6. The Debtor's Confirmed Plan proposes to pay the entire arrears claim through Trustee distributions.

7. 1509 Kennewick Road, Baltimore, MD 21218 (the "Collateral") was the collateral for your secured claim.

8. On January 3, 2018, you filed a Motion for Relief from Stay, alleging that the Debtor failed to make regular contractual post-petition payments.

9. On February 28, 2019 the Bankruptcy Court entered a Notice of Default and Notice of Termination of Automatic Stay, allowing you to exercise and enforce your state law and contractual rights.

10. You admit that you no longer seek payment through the Chapter 13 Bankruptcy Case.

11. You have not amended your Proof of Claim.

12. You admit that your claim should no longer be allowed as a secured claim.

Date: May 2, 2019

Respectfully submitted,

/s/ Nancy Spencer Grigsby  
Nancy Spencer Grigsby  
Chapter 13 Trustee

185 Admiral Cochrane Drive, Suite 240  
Annapolis, MD 21401  
Tel. 301-805-4700  
[ngrigsby@ch13md.com](mailto:ngrigsby@ch13md.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of May, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Request for Admissions will be served electronically by the Court's CM/ECF system on the following:

David L. Ruben sue@mdbankruptcycenter.com, lindsay@rubenlaw.com  
*Counsel for Debtor(s)*

Gene Jung gene.jung@brockandscott.com, [mdecf@brockandscott.com](mailto:mdecf@brockandscott.com),  
[wbecf@brockandscott.com](mailto:wbecf@brockandscott.com), cecily.perry@brockandscott.com  
*Counsel for New Penn Financial, LLC d/b/a Shellpoint Mortgage Servicing*

Mark David Meyer bankruptcy@rosenberg-assoc.com  
*Counsel for Ditech Financial LLC*

Joshua Welborn bankruptcymd@mwc-law.com, bankruptcymd@ecf.inforuptcy.com  
*Counsel for U.S. Bank Trust, NA*

I hereby further certify that on the 2<sup>nd</sup> day of May, 2019, a copy of the Request for Admissions was also mailed first class mail, postage prepaid to:

Archie Vernon Veale  
Sierra Leonne Veale  
1509 Kennewick Road  
Baltimore, MD 21218  
*Debtor(s)*

Ditech Financial, LLC fka Green Tree Servicing LLC  
Attn: Andrew Kussmaul  
PO Box 6154  
Rapid City, SD 57709  
*Creditor's Address on Claim*

Ditech Financial, LLC fka Green Tree Servicing LLC  
Attn: Andrew Kussmaul  
PO Box 0049  
Palatine, IL 60055  
*Creditor's Address on Claim*

Shellpoint Mortgage Servicing  
Attn: Padma Vaghela  
PO Box 10675  
Greenville, SC 29603  
*Creditor's Address on Transfer of Claim*

New Penn Financial, LLC d/b/a Shellpoint Mortgage Servicing  
Attn: Padma Vaghela  
PO Box 10675  
Greenville, SC 29603  
*Creditor's Address on Transfer of Claim*

SN Servicing Corp.  
Attn: Donna Davis  
323 5<sup>th</sup> Street  
Eureka, CA 95501  
*Creditor's Address on Transfer of Claim*

U.S. Bank Trust, NA  
c/o SN Servicing Corporation  
Attn: D. Anthony Sottile  
323 Fifth Street  
Eureka, CA 95501  
*Creditor's Address on Transfer of Claim*

SN Servicing Corp.  
323 Fifth Street  
PO Box 35  
Eureka, CA 95502  
*Creditor's Correspondence Address*

The Prentice-Hall Corporation System  
7 St Paul Street, Suite 820  
Baltimore, MD 21202  
*Resident Agent for SN Servicing Corporation*

*No Resident Agent Found for Shellpoint Mortgage Servicing*

CSC-Lawyers Incorporating Service Company  
7 St Paul Street, Suite 820  
Baltimore, MD 21202  
*Resident Agent for New Penn Financial, LLC*

The Corporation Trust, Incorporated  
2405 York Road, Suite 201  
Lutherville Timonium, MD 21093  
*Resident Agent for Ditech Financial LLC*

The Corporation Trust, Incorporated  
2405 York Road, Suite 201  
Lutherville Timonium, MD 21093  
*Resident Agent for U.S. Bank, NA*

*Via certified mail*  
Mr. Richard K. Davis, CEO  
U.S. Bank, N.A.  
800 Nicollet Mall  
BC-MN-H210  
Minneapolis, MN 55402  
*Officer of U.S. Bank, N.A.*

**/s/ Nancy Spencer Grigsby**  
Chapter 13 Trustee